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Counsel for the Satterlee, Rose Township and  
Springfield Township Groups

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY,  
*et al.*

Debtors.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**NOTICE OF APPEARANCE, REQUEST FOR MATRIX ENTRY  
AND REQUEST FOR SERVICE OF NOTICE AND DOCUMENTS**

PLEASE TAKE NOTICE that pursuant to Bankruptcy Rule 9010(b), the undersigned appears as counsel for the claimants reflected on Exhibit A attached hereto for the sites identified on Exhibit A.

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rule 2002(i), the undersigned requests that Kay Standridge Kress, Esq. be added to the official mailing matrix and service lists in this case. In addition, said counsel requests that copies of all pleadings, motions, notices, and other papers, filed and/or served, in this case or any proceeding therein, be served upon Kay Standridge Kress, Esq. at the following address:

Kay Standridge Kress, Esq.  
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PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code and Rule 3017(a) of the Bankruptcy Rules, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any applications, motions, petitions, pleadings, plans, disclosure statements, complaints or demands transmitted or conveyed by mail, delivery, telephone, telegraph, telecoPeer, telex or otherwise, which are filed or made with regard to the captioned cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit, is intended to waive (i) the party's right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) the party's right to trial by jury in any proceedings or trial so triable herein or in any case, controversy, or proceeding relating hereto, (iii) the party's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which this party is or may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments this party expressly reserves. Further, this Notice of Appearance constitutes a special appearance and is not to be deemed a consent to or waiver of the right to challenge the jurisdiction of the Bankruptcy Court, including without limitation, the

jurisdiction of the Court to adjudicate non-core matters, all of which rights are reserved without prejudice.

Dated: February 14, 2011

PEPPER HAMILTON LLP

/s/ Kay Standridge Kress

Kay Standridge Kress, Esq.

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*Counsel for the Satterlee, Rose Township and  
Springfield Township Groups*

**EXHIBIT A**  
**(Satterlee, Rose Township and Springfield Township Groups)**

**Satterlee Landfill in Sumpter Township, Michigan:**

DTE Energy Company  
Ford Motor Company  
Gerdau MacSteel  
Michelin North America, Inc.  
Owens-Illinois, Inc.  
Tecumseh Products Company

**Rose Township Site in Oakland County, Michigan:**

Ford Motor Company  
Detrex Corporation  
Michelin North America, Inc.  
Akzo Nobel Coatings, Inc.  
TRW Automotive U.S. LLC  
Federal Screw Works  
CNA Holdings LLC

**Springfield Township Superfund Site Springfield Township, Michigan:**

Ford Motor Company  
Detrex Corporation  
Michelin North America, Inc.  
Akzo Nobel Coatings, Inc.  
TRW Automotive U.S. LLC  
Federal Screw Works  
CNA Holdings LLC